

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

Complaint on First-Class Mail  
Service Standards

Docket No. C2001-3

OBJECTIONS OF THE UNITED STATES POSTAL SERVICE  
TO INTERROGATORIES OF DAVID POPKIN  
(October 22, 2001)

In accordance with Rule 26 of the Commission's Rules of Practice and Procedure, the United States Postal Service hereby files this notice of its objections to the following interrogatories, which were filed on October 15, 2001: DBP/USPS-39, 49 and 50.

DBP/USPS-39

This interrogatory requests copies of all documents collected over the last two years reflecting "the actual time utilized for various trips by the organizations that transport mail between facilities (at or above the P&DC level) . . . .

The Postal Service objects on the grounds of burden, overbreadth, and relevance. Each day, the Postal service employs the trucks and airplanes of numerous transportation and cargo service providers to transport mail.<sup>1</sup> For purposes of discussion, let us focus only the transport of mail by truck "at or above the P&DC level." Transportation logs of the arrival and departure times for each truck that departs or arrives at a P&DC are maintained at each of the 177 P&DCs. There are obviously thousands of such log entries made every day. Mr. Popkin wants all of the daily entries made for the past two years. The burden of compiling, organizing and analyzing responsive documents is incalculably overwhelming. Mr. Popkin's stated purpose is so

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<sup>1</sup> As well as Amtrak trains.

that he can “compare the reliability of the [PC Miler] computer program [discussed in the Gannon Declaration] in determining the travel time between two facilities.” This case is not going to turn on arguments about whether PC Miler is sufficiently reliable a tool for the Postal Service to use in designing its transportation network and mail processing operations – or that the use of PC Miler resulted in violations of 39 U.S.C. §§ 3661 or 3662. Accordingly, the Postal Service should not be burdened with compiling, analyzing, or disclosing hundreds of thousands of trip reports.

DBP/USPS-49

This interrogatory asks the Postal Service for information about the recently implemented FedEx contract for the purpose of determining future impacts on mail processing and transportation. Such issues are irrelevant to the complaint in this proceeding, which focuses upon the application of §§ 3661 and 3662 to service standard determinations made before the FedEx contract was implemented. There is no future test year in Docket No. C2001-3 to which projections about the potential impact of the FedEx contract might be relevant.

DBP/USPS-50

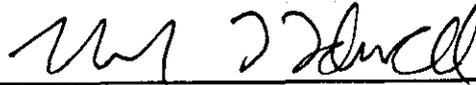
This interrogatory refers to a newspaper article about proposed postal facility closings and asks for a list and schedule of facility closings. It also asks for plans the Postal Service may have to shift the processing of mail to other facilities. Such information also is irrelevant to the complaint in this proceeding, which focuses upon the application of §§ 3661 and 3662 to service standard determinations made before any such potential closings or future processing relocations take place. There is no future test year in Docket No. C2001-3 to which projections about the potential impact of such closings might be relevant.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.  
Chief Counsel  
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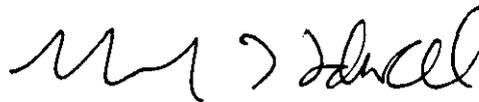
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**CERTIFICATE OF SERVICE**

I hereby certify that, in accordance with section 12 of the Rules of Practice, I have this day served the foregoing document upon:

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